

FILED  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
APR 21 2022

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

UNITED STATES OF AMERICA

§  
§  
§  
§

V.

NO. 6:22-CR-58  
JUDGES JDK - KNM

KEAMBER MERSADISE ROACH

BY  
DEPUTY

INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

COUNT ONE

Violation: 18 U.S.C. § 922(g)(9)  
(Prohibited Person in Possession of a Firearm)

On or about March 3, 2022, in the Eastern District of Texas, defendant **Keamber Mersadise Roach**, did knowingly possess, in or affecting interstate or foreign commerce, a firearm, to wit: a Smith and Wesson, model M&P9, 9mm caliber pistol, while knowing she had been previously convicted of a misdemeanor crime of domestic violence, specifically Assault Family Violence, in the County Court at Law #1 of Gregg County, Texas, in cause number 2016-1334, on November 8, 2016.

In violation of 18 U.S.C. § 922(g)(9).

**COUNT TWO**

Violation: 18 U.S.C. § 922(g)(3)  
(Drug User in Possession of a Firearm)

On or about March 3, 2022, in the Eastern District of Texas, defendant **Keamber Mersadise Roach**, did knowingly possess, in or affecting interstate or foreign commerce, a firearm, to wit: a Smith and Wesson, model M&P9, 9mm caliber pistol, while knowing she was an unlawful user of a controlled substance as defined in 21 U.S.C. § 802.

In violation of 18 U.S.C. § 922(g)(3).

**COUNT THREE**

Violation: 18 U.S.C. § 922(g)(9)  
(Prohibited Person in Possession of a Firearm)

On or about March 23, 2022, in the Eastern District of Texas, defendant **Keamber Mersadise Roach**, did knowingly possess, in or affecting interstate or foreign commerce, a firearm, to wit: a Sig Sauer, model P365, 9mm caliber pistol, while knowing she had been previously convicted of a misdemeanor crime of domestic violence, specifically Assault Family Violence, in the County Court at Law #1 of Gregg County, Texas, in cause number 2016-1334, on November 8, 2016.

In violation of 18 U.S.C. § 922(g)(9).

**COUNT FOUR**

Violation: 18 U.S.C. § 922(g)(3)  
(Drug User in Possession of a Firearm)

On or about March 23, 2022, in the Eastern District of Texas, defendant **Keamber Mersadise Roach**, did knowingly possess, in or affecting interstate or foreign commerce, a firearm, to wit: a Sig Sauer, model P365, 9mm caliber pistol, while knowing she was an unlawful user of a controlled substance as defined in 21 U.S.C. § 802.

In violation of 18 U.S.C. § 922(g)(3).

**COUNT FIVE**

Violation: 18 U.S.C. § 922(g)(9)  
(Prohibited Person in Possession of Firearms)

On or about March 31, 2022, in the Eastern District of Texas, defendant **Keamber Mersadise Roach**, did knowingly possess, in or affecting interstate or foreign commerce, firearms, to wit:

- 1) a TISAS, model Zigana PX-9 Duty, 9mm caliber pistol;
- 2) a Ruger, model LCP, .380 caliber pistol; and
- 3) a North American Arms, .22 caliber revolver;

while knowing she had been previously convicted of a misdemeanor crime of domestic violence, specifically Assault Family Violence, in the County Court at Law #1 of Gregg County, Texas, in cause number 2016-1334, on November 8, 2016.

In violation of 18 U.S.C. § 922(g)(9).

**COUNT SIX**

Violation: 18 U.S.C. § 922(g)(3)  
(Drug User in Possession of Firearms)

On or about March 31, 2022, in the Eastern District of Texas, defendant **Keamber Mersadise Roach**, did knowingly possess, in or affecting interstate or foreign commerce, firearms, to wit:

- 1) a TISAS, model Zigana PX-9 Duty, 9mm caliber pistol;
- 2) a Ruger, model LCP, .380 caliber pistol; and
- 3) a North American Arms, .22 caliber revolver;

while knowing she was an unlawful user of a controlled substance as defined in 21 U.S.C. § 802.

In violation of 18 U.S.C. § 922(g)(3).

**COUNT SEVEN**

Violation: 18 U.S.C. § 924(c)  
(Use, carrying, and possession of firearms  
during and in furtherance of a drug trafficking  
crime)

On or about March 31, 2021, in the Eastern District of Texas, defendant **Keamber Mersadise Roach**, did knowingly use and carry firearms during and in relation to, and did knowingly possess firearms in furtherance of, a drug trafficking crime for which she may be prosecuted in a court of the United States, that is, possession with intent to distribute a controlled substance in violation of 21 U.S.C. § 841(a)(1). The firearms were:

- 1) a TISAS, model Zigana PX-9 Duty, 9mm caliber pistol; and
- 2) a Ruger, model LCP, .380 caliber pistol;
- 3) a North American Arms, .22 caliber revolver.

In violation of 18 U.S.C. § 924(c).

**NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE**

Pursuant to 18 U.S.C. § 924(d) & 28 U.S.C. §2461

As the result of committing one or more of the foregoing offenses alleged in this indictment, the defendant herein shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461:

1. any property constituting, or derived from, and proceeds the defendant obtained, directly or indirectly, as the result of such violations;
2. any of the defendant's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violations, and/or;

**Firearms/Ammunition:**

Any and all firearms, ammunition and accessories, including, but not limited to, the following:

1. a Smith and Wesson, model M&P9, 9mm caliber pistol bearing serial number NFP2765;
2. a TISAS, model Zigana PX-9 Duty, 9mm caliber pistol bearing serial number T062021DC00220;
3. a Ruger, model LCP, .380 caliber pistol bearing serial number 372339549; and
4. a North American Arms, .22 caliber revolver bearing serial number Z06575.

By virtue of the commission of the offenses alleged in this indictment, any and all interest the defendant has in the above-described property is vested in the United States and hereby forfeited to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461.

A TRUE BILL

  
\_\_\_\_\_  
GRAND JURY FOREPERSON

BRIT FEATHERSTON  
UNITED STATES ATTORNEY

  
LUCAS MACHICEK  
Assistant United States Attorney

4/21/2022

Date

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**NOTICE OF PENALTY**

**COUNTS ONE-SIX**

Violation: 18 U.S.C. §§ 922(g)(3) & (g)(9)

Penalty: Imprisonment for not more than 10 years, a fine not to exceed \$250,000, or both, and supervised release of not more than 3 years.

Special Assessment: \$100.00

**COUNT SEVEN**

Violation: 18 U.S.C. § 924(c)

Penalty: Imprisonment for a term of not less than 5 years or more than life, which must be served consecutively to any other term of imprisonment, a fine not to exceed \$250,000, or both, and supervised release of not more than 5 years.

Special Assessment: \$100.00